UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JULIAN SANCTON, on behalf of himself and all others similarly situated,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC, and MICROSOFT CORPORATION,

Defendant.

ECF CASE

No. 1:23-cv-10211

DECLARATION IN SUPPORT OF MOTION FOR ADMISSION OF ATTORNEY PRO HAC VICE

Alejandra C. Salinas, declares:

- 1. I am a Partner with the law firm of Susman Godfrey L.L.P.
- 2. I submit this declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
- 3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the Supreme Court of Texas.
- 4. There are no pending disciplinary proceedings against me in any state or federal court.
- 5. I have never been convicted of a felony.
- 6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
- 7. My attorney registration number for the State Bar of Texas is 24102452.

- 8. Wherefore, your declarant respectively submits that she be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-10211 for Plaintiff (Julian Sancton) and the Proposed Class.
- I, Alejandra C. Salinas, declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Dated: November 27, 2023 Respectfully submitted,

/s/ Alejandra C. Salinas

Alejandra C. Salinas TX State Bar No. 24102452 SUSMAN GODFREY L.L.P. 1000 Louisiana Street, Suite 5100 Houston, TX 77002-5096

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Attorney for Plaintiff and the Proposed Class